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October 12, 2005

VIA FEDERAL EXPRESS

Clerk of the Court
United States Bankruptcy Court
614 Alexander Hamilton Custom House
One Bowling Green
New York, NY 10004-1400

**RE: In the Matters of Delphi Corporation, et al.
Chapter 11 Case No. 05-44481**

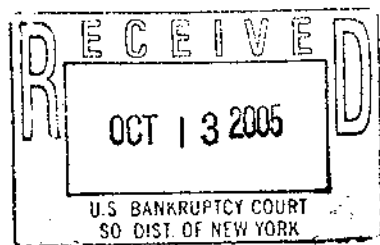
Dear Clerk:

Enclosed for filing in the captioned matter, please find the originals and two (2) copies of each of the following pleadings:

1. Specmo Enterprises' Motion for Relief from Stay to Effect Setoff;
2. Brief in Support of Specmo Enterprises' Motion for Relief from Stay to Effect Setoff;
3. Motion for Admission Pro Hac Vice with \$25.00 check for admission fees; and
4. Proof of Service.

Kindly file these documents in your usual manner and return time-stamped copies of each to the undersigned in the self-addressed, stamped envelope provided herein for that purpose.

If you should have any questions, or need additional information, please do not hesitate to contact me.



GHC/clg
Enclosures

cc: John William Bulter, Jr., Esq. (via email)
Alicia M. Leonhard, Esq. (via facsimile)
Mr. Thomas M. Ritter (via email)

Very truly yours,

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In the Matters of:)	Case No. 05-44481 (RDD)
)	(Chapter 11 – Jointly Administered)
DELPHI CORPORATION, <u>et al.</u>)	
)	
Debtors-in-Possession.)	Hon. Robert D. Drain

**SPECMO ENTERPRISES' MOTION FOR RELIEF
FROM STAY TO EFFECT SETOFF**

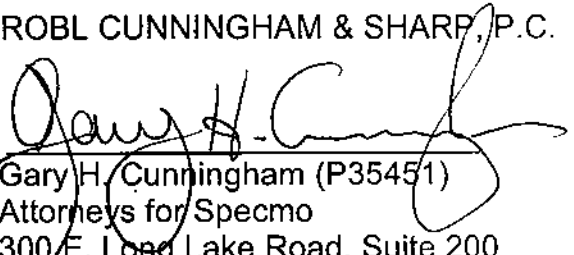
NOW COMES a creditor of the Debtor, Specmo Enterprises, Inc. ("Specmo"), by and through its attorneys, Strobl Cunningham & Sharp, P.C., and for the reasons stated in its Brief in Support of this Motion, requests relief from the automatic stay provisions of 11 U.S.C. § 362 in order to, pursuant to 11 U.S.C. § 553, exercise its state law right to offset a mutual pre-petition debt owing from the Debtor to Specmo, in the amount of \$528,328.93 (the "Debtor Pre-Petition Debt") against a pre-petition debt owing from Specmo to the Debtor, in the amount of \$367,429.97 (the "Specmo Pre-Petition Debt").

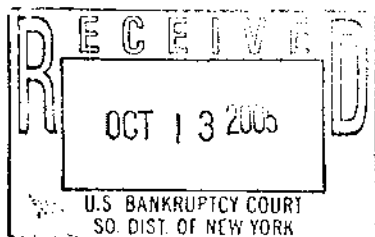
WHEREFORE, Specmo requests that the Court enter an Order, in the form attached hereto and incorporated herein by reference, granting Specmo relief from the automatic stay so that it may exercise its right of setoff.

Respectfully submitted,

STROBL CUNNINGHAM & SHARP, P.C.

By:


Gary H. Cunningham (P35451)
Attorneys for Specmo
300 E. Long Lake Road, Suite 200
Bloomfield Hills, MI 48304
(248) 540-2300



Dated: October 12, 2005

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In the Matters of:)	Case No. 05-44481 (RDD)
)	(Chapter 11 – Jointly Administered)
DELPHI CORPORATION, <u>et al.</u>)	
)	
Debtors-in-Possession.)	Hon. Robert D. Drain
)	

**ORDER GRANTING SPECMO ENTERPRISES, INC.'S MOTION
FOR RELIEF FROM STAY TO EFFECT SETOFF**

THIS MATTER having come before the Court on Specmo Enterprises' ("Specmo") Motion for Relief From Stay to Effect Setoff (the "Motion"), and the Court being otherwise fully advised in the premises; NOW, THEREFORE:

IT IS HEREBY ORDERED that Specmo is granted relief from the automatic stay provisions of 11 U.S. C. § 362(a) in order to setoff the Specmo Pre-Petition Debt (as defined in the Motion) against the Debtor Pre-Petition Debt (as defined in the Motion).

Dated: _____, 2005

United States Bankruptcy Judge